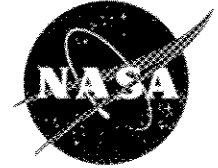


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



September 28, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Graduate Aerospace Laboratories (GALCIT), California Institute of Technology (CalTech), The Athenaeum Reception and Dinner on September 29, 2011

On September 29, 2011, the California Institute of Technology (CalTech), a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a reception and dinner at CalTech, the Athenaeum in Pasadena, California, at 6 p.m. This event will honor David W. Thompson, Chairman, President and Chief Executive Officer of Orbital Sciences Corporation for his contributions to the aerospace industry.

The reception will be widely attended by members of Congress and their staff, academia, and the general public, media and contractors. Approximately 230 people have been invited to attend. The estimated cost of the reception, which includes all food and beverages, is \$150 per person. I find that the reception meets the requirements of a "widely-attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). The event will provide NASA employees an opportunity to discuss the mission and other NASA programs with representatives of the communities participating in the reception. Accordingly, NASA employees whose duties do not substantially affect the event sponsor or a majority of its members may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

Moreover, NASA employees whose duties do not substantially affect the event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490 may accept an invitation for free attendance to the event. However, NASA employees whose duties may substantially affect the event sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone". The signature is fluid and cursive, with a long horizontal stroke at the end.

Adam F. Greenstone